

Jon Niermann, *Chairman*  
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## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

February 7, 2019

Mr. Virgilio Cocianni, Remediation Manager  
Schlumberger  
121 Industrial Blvd  
Sugar Land, Texas 77478

Re: Comments to 2018 Response Action Plan (RAP) Addendum, dated February 15, 2018, Former Cameron Iron Works Facility Site; located at 1000 Silber Road, Houston, Harris County, TX; Voluntary Cleanup Program (VCP) No. 221; RN101474880, CN600405872

Dear Mr. Virgilio:

The VCP of the Texas Commission on Environmental Quality (TCEQ) has reviewed the above-mentioned submittal prepared by ERM. The TCEQ accepts the submittal with the following comments. If necessary, please respond to the noted comment by referencing its corresponding number:

- 1) Please submit figures that show the current state of the plume associated with the Plume Management Zone (PMZ) as it relates to the VCP property. Included in this submittal should be the point of exposure wells, boundaries of the PMZ, and the most recent sampling data for said wells.
- 2) The RAP states that both the North and South Treatment Systems will be decommissioned due to their inability to capture the entirety of the plumes with which they are affiliated. In addition, the report states that the systems will not speed up remediation when compared to natural attenuation. It is understood that shutting the systems off to assess plume stability is necessary in order to have a current depiction of the affected groundwater. Temporally shutting off the system for approximately a year's time and reevaluating site conditions for possible decommissioning at a later date might be a proper action. However, the TCEQ does not support the decommissioning of said systems at this time. Please also take into account that the systems are in place to maintain hydraulic control of the plume. If the system is not capable of doing such, it may be necessary to enhance the systems to a level in which they function as expected.
- 3) It appears as though MW-93R depicts an exceedance for tetrachloroethene near the cul de sac of Farish Circle, thus rendering this section of the plume as not delineated. Please move forward with efforts to achieve delineate at this location.

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- 4) Please submit the required Response Action Effectiveness Reports/Progress Reports on an annual basis. Until such time that delineation has been demonstrated, please maintain the current sampling schedule which may be adjusted in the future.

Future submittals should be mailed to the TCEQ, Voluntary Cleanup Program, mail code MC-221, at the letterhead address. Please provide one paper copy and one electronic copy (on USB or disc) of all submittals. You may contact me with any questions at (512) 239-2205.

Sincerely,



Rodney Bryant, Project Manager  
VCP-CA Section  
Remediation Division  
Texas Commission on Environmental Quality

RB/bk

cc: Ms. Jennifer Laggan, Project Manager, CH2M Hill, 2702 Margaret Falls Lane, Katy, Texas 77494  
Mr. Jason Ybarra, Waste Section Manager, TCEQ Region 12 Office, R12